



*August 22, 2019*

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Notice of Ex Parte Communication  
MB Docket Nos. 19-3 and 19-193**

Dear Ms. Dortch:

On August 20, 2019, Michael Starling, President & G.M., and Drew Sheckler, Secretary, of Cambridge Community Radio, Inc. met with Albert Shuldiner and James Bradshaw of the Audio Services Division. We discussed our community service initiatives to date as a new 2013 LPFM round station and our support for the FCC's rulemaking in 19-3. We expressed support for the FCC's detailed proposed streamlining improvements to the point award criteria, and expressed our concerns about the long term viability of the mandatory time sharing operations. We supported the future opening of a window for new NCEFM services ahead of a window for new LPFMs to avoid the disruption that could befall new secondary service LPFMs. We also suggested an additional tie breaking criteria of past meritorious broadcast experience as a relevant and meaningful success predictor based on the unique challenges of establishing new, ownership-diverse, locally-based noncommercial services

We additionally expressed our support for the common sense LPFM technical improvements outlined in MB Docket No. 19-193 and expressed support for the 250 watt LPFM power increase proposal where time-proven spacing safeguards can be met to avoid any meaningful risk of interference.

Respectfully submitted,  
/s/ Michael Starling, Esq.  
Michael Starling, President

C: Mr. Albert Shuldiner, Mr. James Bradshaw